

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

UNITED STATES OF AMERICA,

UNDER SEAL

Plaintiff,

Case No. _____

v.

JOSHUA HOWLAND,

[DOB: 01/09/1978],

THOMAS DAVIS MOORE, JR.,

[DOB: 11/30/1958],

RYAN NEAL MONTGOMERY,

[DOB: 06/17/1980],

Defendants.

COUNT ONE:

**Conspiracy to Advertise Child
Pornography**

18 U.S.C. § 2251(d) and (e)

NLT: 15 Years Imprisonment

NMT: 30 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class B Felony

COUNT TWO:

**Conspiracy to Distribute and Receive
Child Pornography**

18 U.S.C. § 2252A(a)(2) and (b)(1)

NLT: 5 Years Imprisonment

NMT: 20 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class C Felony

Forfeiture Allegation

\$100 Mandatory Special Assessment
Each Count

I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between in or about June 2019 and in or about July 2020, the dates being approximate, in the Western District of Missouri and elsewhere, JOSHUA HOWLAND, THOMAS DAVIS MOORE, JR., and RYAN NEAL MONTGOMERY, defendants herein, did knowingly conspire with each other and others known and unknown to the Grand Jury to make, print, and publish, and to cause to be made, printed, and published, by means of an internet website whose common name

is known to the Grand Jury and is referred to herein as “Website A,” any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce any visual depiction, the production of which visual depiction involved the use of a minor engaged in sexually explicit conduct and such visual depiction was of such conduct, knowing and having reason to know that such notice and advertisement would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, and which notice and advertisement was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, in violation of Title 18, United States Code, Section 2251(d) and (e).

COUNT TWO

Between in or about June 2019 and in or about July 2020, the dates being approximate, in the Western District of Missouri and elsewhere, JOSHUA HOWLAND, THOMAS DAVIS MOORE, JR., and RYAN NEAL MONTGOMERY, defendants herein, did knowingly conspire with each other and others known and unknown to the Grand Jury to distribute and receive child pornography, by means of an internet website whose common name is known to the Grand Jury and is referred to herein as “Website A,” using any means and facility of interstate and foreign commerce in violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1).

FORFEITURE ALLEGATION

The allegations contained in Counts One and Two are realleged and are incorporated by reference herein for the purpose of alleging forfeiture of: any visual depiction described in Title 18, United States Code, Sections 2251 or 2252A, or any film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of these sections; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses; including, but not

limited to the following:

- For defendant JOSHUA HOWLAND:
 - One black Lenovo laptop, model 81Q6, S/N: PF1DY3UA, with charger and USB plugin; and
 - One custom-built desktop tower, ABS Essential Meteor ALI206, identifying no.: 1057503109.
- For defendant THOMAS DAVIS MOORE, JR.:
 - One LG Tablet G Pad X 8.0, S/N: 704CQRN167790;
 - One Asus Computer Tower, S/N: 091317517804;
 - One Motorola XT 2041-6 mobile phone, S/N: ZY227P2T5Y; and
 - One LG GSM phone, SN: 703KPPB093984.
- For defendant RYAN NEAL MONTGOMERY:
 - One HP laptop, S/N 5CD70713KR.

All in violation of Title 18, United States Code, Section 2253.

TRUE BILL.

/s/ Pamela Carter-Smith

FOREPERSON OF THE GRAND JURY

/s/ Alison Dunning

Alison Dunning

David Luna

Assistant United States Attorneys

Kyle P. Reynolds

Trial Attorney

U.S. Department of Justice, Criminal Division

Child Exploitation and Obscenity Section

Date: 11/3/2020
Kansas City, Missouri